

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

UNITED STATES OF AMERICA

PLAINTIFF

VS.

CASE NO. 3:16-CR-00030-HTW-LRA-007

ASHABEN PATEL, ET AL.

DEFENDANTS

MOTION TO CONTINUE DETENTION HEARING

COMES NOW, Seth Little of the law firm Schwartz & Associates, P.A., 162 E. Amite Street, Jackson, Mississippi 39201 and submits this his Motion to Continue Detention Hearing and in support thereof states as follows:

1. Defendant Ashaben Patel, through counsel, previously filed a Motion to Re-Open Detention Hearing as a result of Defendant's prior counsel obtaining documentation regarding Patel's identity and prior attempts to enter the country, which was information sought by the Court in the prior detention proceeding.
2. In addition to presenting said documentation to the Court, Defendant's counsel sought to present the testimony of Anwer Vait, who testified in the prior detention proceeding. Counsel for the Defendant intends to use the testimony of Mr. Vait to clarify and authenticate the documentation provided to the Court as well as provide further information regarding Ms. Patel's identity and history.
3. Due to a family emergency, Mr. Vait, a resident of Houston, Texas, will not be able to travel to Jackson, Mississippi on September 19, 2016 to attend the previously scheduled hearing. Counsel for the Defendant and the United States had previously discussed with the Court the date of September 30, 2016 as an alternate date for said

detention hearing. Counsel for the Defendant and Mr. Vait do not have a conflict on this date and Mr. Vait will be able to attend on this date.

WHEREFORE, PREMISES CONSIDERED, Defendant Ashaben Patel respectfully requests that the detention hearing of Ashaben Patel, previously scheduled for September 19, 2016, be continued and rescheduled to September 30, 2016 or a date mutually agreeable to all parties and the Court.

RESPECTFULLY SUBMITTED this, the 1st day of September, 2016,

ASHABEN PATEL

BY: /s/ Seth C. Little
SETH LITTLE, MSB #102890
Attorney for Ashaben Patel

OF COUNSEL:
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CERTIFICATE OF SERVICE

I, the undersigned, Seth Little, attorney for the Plaintiffs, do hereby certify that I have this day mailed via U.S postal mail, a true and correct copy of the foregoing *Notice of Appearance*, to:

Jerry Rushing
U.S. Attorneys Office- Jackson
501 E. Court Street
Suite 4.430
Jackson, Mississippi 39201
Counsel for the United States of America

THIS, the 1st day of September, 2016.

/s/ Seth C. Little

SETH LITTLE, MSB #102890